

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Criminal No. 17-CR-20243-SHL

PATRICIA PARSONS,

Defendant.

DEFENDANT'S MOTION TO EXTEND DATE OF SURRENDER FOR DEFENDANT TO
BEGIN SERVICE OF SENTENCE

The Defendant, through her attorney, moves the Court to extend the date of her surrender to begin the service of her sentence, which is presently set for January 18, 2018.

The Defendant would state that to prepare for her incarceration, she has been required to "place" or find homes for over 100 domesticated and semi-domesticated animals which live on her rural property. She has placed the emus, rabbits, goats, horses, donkeys, turkeys, and most of the dogs, but she is still lacking homes for 33 dogs and 8 cats. She believes the final placement will not be completed for 30 days. Her alternative, should the Court not agree to extend the date of surrender, would be to put them down, which would create disposal and burial issues, and which is an option she does not wish to utilize.

The Defendant would anticipate that this request will cause a delay in her surrender date of no more than thirty (30) days.

Respectfully Submitted,

/s/ JEFFREY JONES
Jeffrey Jones (#5776)
Attorney for Defendant
6540 Stage Road
Bartlett, TN 38134
(901) 386-1207

CERTIFICATE OF SERVICE

I certify that I have forwarded a copy of this Motion to all parties of record, as required by the Federal Rules of Criminal Procedure, this 13 day of January, 2018.

/s/ Jeffrey Jones (#5776)
Jeffrey Jones